

Mr. Harley Minniear
Field Supervisor
State Fire Marshal
State of Nebraska
1047 South Street
Lincoln, NB 68502

Dear Mr. Minniear:

This refers to your letter of September 19, 1974, notifying me that the State Fire Marshal has granted all gas companies in Nebraska a waiver from compliance with 49 CFR Part 192 to permit the transportation of a mixture of propane, air, and natural gas in plastic distribution lines for the purpose of peak shaving.

The notice of the waiver states that National Fire Protection Association (NFPA) Standard No.58 (which is incorporated by reference in 49 CFR 192.11(a)) prohibits the use of plastic pipe in transporting propane.

Note, however, that under Section 192.11(c), the requirements of NFPA Standard No.58 do not apply when a propane and air mixture is used to supplement supplies in a natural gas distribution system. This exception was established to provide for the peak shaving situations to which the waiver is directed. Consequently, we believe the waiver is unnecessary, and in accordance with Section 3(e) of the Natural Gas Pipeline Safety Act of 1968, object to the granting of the waiver.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

Mr. R. E. Heimlich
Manager - Gas Operations
Northwestern Public Service Company
Northwestern National Bank Building
Huron, South Dakota 57350

Dear Mr. Heimlich:

A waiver has been granted all operating gas companies in Nebraska to use propane peak shavings plants and inject its propane air mixture with natural gas into its distribution system where plastic lines are used.

No plastic piping is allowed in the piping of the peak shaving plant. Steel shall be used throughout. Steel lines shall carry the propane vapor to the down stream side of the mixer before coming in contact with plastic distribution system for natural gas.

Again this waiver only constitutes peak shaving plants for natural gas distribution systems, as Nebraska uses N.F.P.A. #58, for its guide on propane and Section 231-Pipe, Paragraph 2310 clearly states pipe shall be wrought iron or steel (black or galvanized_ brass or copper.

As you know this waiver does not become effective for 45 days as D.O.T. Office of Pipeline Safety has the option to approve or disapprove any waiver a State Agency sends out.

Sincerely,

Joe L. Pluta
State Fire Marshal

By Harley Minniear
Deputy State Fire Marshal

Mr. Joseph C. Caldwell
Director
Office of Pipeline Safety
Office of the Secretary of Transportation
Washington, D. C. 20590

Dear Sir:

I hope the enclosed waiver meets with your approval with the information and correspondence.

I made this decision because I don't think there is any other course to take with the use of natural gas with as much plastic that is being used today. If it were a straight propane gas system then I would have to say no plastic, because I do not find any where it says plastic can be used for a straight propane system.

The reason of no plastic within the shaving plant is because of the heat of a vaporizer, other than that I cannot see any reason for disallowing propane and natural gas mixture.

Sincerely,

Harley Minniear
Field Supervisor

Mr. Richard Steven, Director
National Fire Protection Association
470 Atlantic Avenue
Boston, Massachusetts 02210

Dear Mr. Stevens:

I would greatly appreciate receiving your answer or that of the Committee who worked on Pamphlet #58 (1972) pertaining to storage and handling of Liquefied Petroleum Gas Which provides in Section 231, that pipe shall be wrought iron or steel (black or galvanized) brass, or copper and shall comply with Section 2310(a) through (d).

A question has been raised by the Natural Gas Companies where for a short time (coldest days) in their propane-air peak shaving plants use a maximum of 50% propane-air and 50% natural gas in their gas lines which have some plastic pipe to augment the fuel during winters coldest days.

In view of provisions of #58 mentioned above, can I permit them to use propane on the above-mentioned 50% basis in plastic pipes? Would this create a hazard by plastic pipes being deteriorated and causing leaks from the propane-air? If so I shall stop this practice.

I enclose a copy of the Gas Company's letter to me relative to this problem which contains the Natural Gas Companies detailed comments and position.

An early reply to my letter will indeed be helpful in my making a decision.

Thanking you for all your cooperation I remain

Sincerely yours,

Joe L. Pluta
State Fire Marshal

Enclosure